

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BISOUS BISOUS LLC,

Plaintiffs,

v.

THE CLE GROUP, LLC,

Defendant.

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C.A. No. 3:21-cv-01614-B

**THE CLE GROUP, LLC'S UNOPPOSED MOTION FOR A 1-DAY EXTENSION OF
TIME TO FILE RESPONSE TO PLAINTIFF'S APPLICATION FOR A TEMPORARY
RESTRAINING ORDER AND MOTION FOR PRELIMINARY INJUNCTION**

Defendant The CLE Group, LLC hereby moves the Court for an Order extending Defendant's deadline to file a Response to Plaintiff's Application for a Temporary Restraining Order and Motion for Preliminary Injunction from 5:00 p.m. CT today, July 27, 2021 until 5:00 p.m. CT tomorrow, July 28, 2021. In support of its motion, Defendant states as follows:

1. On July 23, 2021, the Court entered its Electronic Order (Dkt. 15), requiring Defendant to "enter an appearance in this matter and file a response to 12 Plaintiff's Motion for a Temporary Restraining Order on or before Tuesday, July 27, 2021 at 5:00 p.m." *Id.*
2. Buether Joe & Counselors, LLC were retained by Defendant on Friday, July 23, 2021.
3. On Friday, July 23, 2021, counsel for Defendant filed their Notices of Appearance.
4. Counsel has been diligently drafting a Response, however, Counsel is awaiting certain documents, including a signed Declaration from Defendant, which is to be included in the Appendix filed with the Response.

5. In addition, counsel anticipates filing video clips with the Response, which will need to be submitted to the Court manually before 4:30 p.m. on the day of filing.
6. Counsel is seeking a 1-day extension to file the Response to Plaintiff's Application for a Temporary Restraining Order and Motion for Preliminary Injunction.
7. Plaintiff does not oppose the motion.
8. Defendant's motion is not filed for delay or any other improper purpose.

For foregoing reasons, Defendant respectfully request that its motion for a 1-day extension of time to respond to Plaintiff's Application for a Temporary Restraining Order and Motion for Preliminary Injunction be granted.

Dated: July 27, 2021

Respectfully submitted,

BUETHER JOE & COUNSELORS, LLC

By: /s/ Kenneth P. Kula
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**ATTORNEYS FOR DEFENDANT
THE CLE GROUP, LLC**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on this date he conferred with Plaintiff's counsel, Mr. David Conrad, requesting a 1-day extension to respond to Plaintiff's motion for TRO and Preliminary Injunction. Counsel for Plaintiff stated that the instant motion is unopposed. *See* Local Rule CV-7.1(a), (b).

/s/ Kenneth P. Kula

Kenneth P. Kula

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5.1(d) on this 27th day of July, 2021.

/s/ Kenneth P. Kula

Kenneth P. Kula